

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

NEWPORT NEWS DIVISION

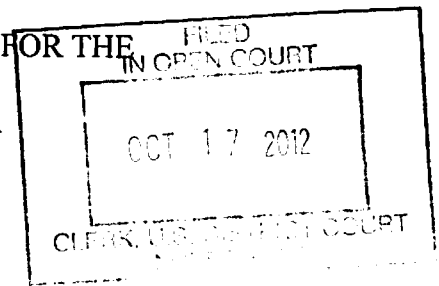
UNITED STATES OF AMERICA

V.

RAUL ANTONIO ESCOBAR-MARTINEZ

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Criminal No. 4:12cr39



STATEMENT OF FACTS

Comes now the United States and offers to the court that had the above-styled matter proceeded to trial the United States would have proven the following facts beyond a reasonable doubt.

1. In 2010, an investigation began into the criminal activities of an organization located in Richmond, Virginia. This investigation is being conducted by the Bureau of Alcohol, Tobacco, Firearms and Explosives in conjunction with more than a dozen other federal, state and local law enforcement agencies. This investigation involves a multi-faceted criminal organization engaged in the robbery of traveling jewelry salesmen/couriers and the laundering of U.S. currency. The activity of this criminal organization involves overt acts and criminal activity that have been committed since at least 2009 throughout the U.S., including the Eastern District of Virginia (EDVA).

2. Based upon the combined training and experience of the investigative team, and on law enforcement intelligence reports, the term "South American Theft Groups" (SATG) is a term that jewelry industry members have historically used to describe transnational criminal groups consisting primarily of Hispanic males and females that are known or believed to be Colombian nationals that rob traveling jewelry salespersons and couriers. The term SATGs has been

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unofficially adopted by U.S. law enforcement. SATGs work in teams to steal jewelry, gems, and precious metals and their "tools of the trade" consist of vehicles, knives, razor blades, center punches, gloves, and masks. SATGs effectively target the vulnerabilities inherent in transporting jewelry. Jewelry salespersons and couriers, who tend to personally carry their merchandise, are conspicuous, unprotected, and easy targets for SATGs. It is common for jewelry salespersons and couriers to carry up to \$500,000 in retail value of jewels at one time.

3. The investigation determined that the persons described in the indictment are members of an SATG based in and around the Richmond area of Virginia and are believed to have committed at least 15 robberies of jewelry salespersons and couriers and two vehicle break-ins involving the theft of approximately five million dollars of jewelry in the EDVA including Prince William County, Henrico County, Virginia Beach, Williamsburg, and McLean, and other locations such as Bronx, New York; Newark, New Jersey; Raleigh, North Carolina; Rutherford, New Jersey; Baltimore, Maryland; and Queens, New York. It is also believed that this SATG has conducted pre-robbery surveillance in the Western District of Virginia including Charlottesville, Harrisonburg, and Roanoke. Ten of the robberies of the jewelry salespersons and couriers have occurred as they either arrived or departed from a hotel and the majority of these robberies have occurred Tuesdays and Thursdays. It does not appear that the victims of the aforementioned robberies are in anyway involved in providing information to the suspects to cause the robberies.

4. The defendant was involved in several of the robberies committed by this SATG including April 26, 2010, in Vienna, Virginia; October 26, 2010, in Raleigh, North Carolina; November 2, 2010, in Rutherford, New Jersey; November 18, 2010, in Dumfries, Virginia; April 7, 2011, in Towson, Maryland; and December 21, 2011, in Henrico, Virginia. The defendant was also involved in surveillance operations of jewelry stores attempting to identify prospective victims including November 15, 2011, in Virginia Beach, Virginia; January 26 and 27, 2012,

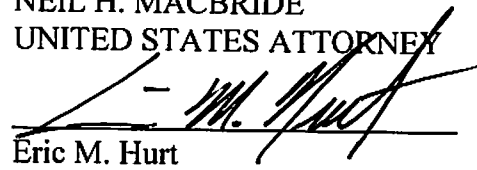
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surveillance of a prospective robbery victim from Richmond, Virginia, to Raleigh, North Carolina; and the February 28, 2012, surveillance of a prospective robbery victim in Nashville, Tennessee.

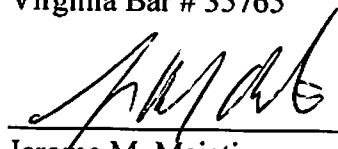
5. These events occurred in the Newport News Division of the Eastern District of Virginia.

Respectfully submitted,

NEIL H. MACBRIDE  
UNITED STATES ATTORNEY



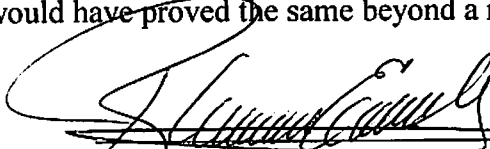
Eric M. Hurt  
Assistant United States Attorney  
Virginia Bar # 35765  
Fountain Plaza Three, Suite 300  
721 Lakefront Commons  
Newport News, Virginia 23606  
Virginia Bar # 35765



Jerome M. Maiatico  
Special Assistant United States Attorney  
PA Bar # 210073  
Attorney for the United States  
United States Attorney's Office  
721 Lakefront Commons, Suite 300  
Newport News, Virginia 23606  
Phone: (757) 591-4000  
Fax: (757) 591-0866

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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, RAUL ANTONIO ESCOBAR-MARTINEZ and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

  
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RAUL ANTONIO ESCOBAR-MARTINEZ

I am RAUL ANTONIO ESCOBAR-MARTINEZ's attorney and I have carefully reviewed the above Statement of Facts with the defendant. To my knowledge, the decision to stipulate to these facts is an informed and voluntary one.

  
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Mark Ravis

Attorney for RAUL ANTONIO ESCOBAR-MARTINEZ

  
(local counsel)

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